

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION**

CATHERINE ALEXANDER,

Plaintiff,

-VS-

TAKE-TWO INTERACTIVE SOFTWARE, INC.,
2K GAMES, INC.; 2K SPORTS, INC.; WORLD
WRESTLING ENTERTAINMENT, INC.;
VISUAL CONCEPTS ENTERTAINMENT;
YUKE'S CO., LTD.; AND YUKE'S LA INC.,

Case No. 3:18-cv-966-MJR-DGW

Defendants.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO
FILE RESPONSE TO PLAINTIFF’S COMPLAINT**

1. NOW COME Defendants TAKE-TWO INTERACTIVE SOFTWARE, INC., 2K GAMES, INC., 2K SPORTS, INC., and VISUAL CONCEPTS ENTERTAINMENT by and through their Attorneys, DALE CENDALI and JOSHUA SIMMONS of KIRKLAND & ELLIS LLP, and Defendant WORLD WRESTLING ENTERTAINMENT, INC., by and through its Attorneys, JERRY McDEVITT and CURTIS KRASIK of K&L GATES (collectively, “Moving Defendants”), and pursuant to Federal Rule of Civil Procedure 6, hereby move this honorable Court for an extension of time of 60 days (from May 10, 2018 to July 9, 2018) to file a response to Plaintiff CATHERINE ALEXANDER’s (“Plaintiff”) Complaint. In support thereof, Moving Defendants state as follows:

2. On April 17, 2018, Plaintiff, an individual resident of Illinois, filed her Complaint alleging that Defendants infringed certain copyrights by creating the video game series *WWE 2K*. [Doc. 1].

3. On April 19, 2018, all Moving Defendants except Visual Concepts Entertainment were served. [Doc. 16, 17, 18, 19]. On April 25, 2018, Moving Defendant Visual Concepts Entertainment was served. [Doc. 20]. Moving Defendants' response is currently due on May 10, 2018.

4. As Counsel for Moving Defendants only was recently retained and due to the nature and complexity of the case, Moving Defendants respectfully request an extension of time of 60 days (from May 10 28, 2018 to July 9, 2018) to file a response to Plaintiff's Complaint.

5. Counsel for Moving Defendants contacted counsel for Plaintiff regarding the requested extension. Counsel for Plaintiff stated that they have no objection to this extension.

6. This motion is made in good faith and is not intended to cause undue delay.

WHEREFORE, for the above and foregoing reasons, Moving Defendants respectfully request this honorable Court grant them an extension of time to file a response as stated herein.

Dated: May 9, 2018

Respectfully submitted,

/s/Dale M. Cendali

Dale M. Cendali (*pro hac vice* pending)
Joshua L. Simmons (*pro hac vice* pending)
Kirkland & Ellis LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
dale.cendali@kirkland.com
joshua.simmons@kirkland.com

Attorneys for Defendants 2K Games, Inc., 2K Sports, Inc., Take-Two Interactive Software, Inc., and Visual Concepts Entertainment

Jerry McDevitt (*pro hac vice* pending)
Curtis Krasik (*pro hac vice* pending)
K&L Gates
210 Sixth Avenue
Pittsburgh, PA 15222
Telephone: (412) 355-8608
Jerry.McDevitt@klgates.com
Curtis.Krasik@klgates.com

*Attorneys for Defendant World Wrestling
Entertainment, Inc.*

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CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2018, the foregoing document, **Motion for Extension of Time**, was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Anthony G. Simon	asimon@simonlawpc.com
Benjamin R. Askew	baskew@simonlawpc.com
Anthony R. Friedman	afriedman@simonlawpc.com
R. Seth Crompton	scrimpton@allfela.com

/s/Dale M. Cendali

Dale M. Cendali (*pro hac vice* pending)
Kirkland & Ellis LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
dale.cendali@kirkland.com

Attorney for Defendants 2K Games, Inc., 2K Sports, Inc., Take-Two Interactive Software, Inc., and Visual Concepts Entertainment